REPORT SUMMARY
Port of Iberia, Louisiana
Draft Feasibility Report

S.1 STUDY INFORMATION

STUDY AUTHORITY

The Port of Iberia, Louisiana Study was conducted in accordance with Section 431 of the Water Resources Development Act (WRDA) of 2000, Public Law 106-541, dated 11 December 2000, which reads as follows:

> **SEC. 431. IBERIA PORT, LOUISIANA.**
> The Secretary shall conduct a study to determine the feasibility of carrying out a project for navigation, Iberia Port, Louisiana.

In May 2001, the Port of Iberia (POI) requested that the Corps of Engineers (USACE) consider deepening the access channels from the port to the Gulf of Mexico. Reconnaissance study efforts were initiated in 2001 and a reconnaissance report was completed in August 2002 recommending further Federal involvement.

STUDY SPONSOR

The POI participated as the non-Federal cost-share sponsor for this feasibility study by providing fifty percent of the total study costs through cash and in-kind services.

STUDY PURPOSE AND SCOPE

The purpose of this study is to determine the feasibility of deepening the existing navigation channels between the POI and the Gulf of Mexico. An August 2002 reconnaissance report recommended deepening the Commercial Canal, portions of the Gulf Intracosatal Waterway (GIWW) and Freshwater Bayou (FWB) from an average depth of 12-feet to a depth of 20-feet from the POI to the Gulf of Mexico. The POI limited the study scope to a maximum authorized depth of 20-feet.

The limits of the proposed project extend into Vermilion Parish, which is beyond the jurisdiction of the POI. Thus, the Louisiana Department of Transportation and Development (LADOTD) agreed to act as the non-Federal sponsor for construction of the proposed project.

The scope is to develop and evaluate measures to improve navigation access from the POI to the Gulf of Mexico, improve and maintain the current state of the environmental resources, and to minimize any future marsh degradation.

Economic studies considered the influence of worldwide offshore oil and gas production, but especially that in the Gulf of Mexico region. Engineering and environmental studies were limited to

the immediate areas that would be physically affected or influenced, by construction and maintenance activities.

PROJECT LOCATION/CONGRESSIONAL DISTRICT

The study area is bounded by the cities of Lafayette and New Iberia, to the north; the Atchafalaya River to the east; the Vermilion River and FWB to the west; and the Weeks Bay/Vermilion Bay complex and the Gulf of Mexico to the south. Major communities in the study area include New Iberia, Lafayette, Jeanerette, Franklin, Abbeville, and numerous smaller communities. The study area is located in Congressional Districts: LA-3 and LA-7

PRIOR REPORTS AND EXISTING WATER PROJECTS

Federal Studies

- Port of Iberia, Louisiana Navigation Reconnaissance Report, dated August 2002
- New Iberia to the Gulf of Mexico Navigation Channel, Louisiana Feasibility Study
- Intracoastal Waterway Locks, Louisiana Feasibility Report, dated November 2003
- Louisiana Coastal Area, Louisiana – Ecosystem Restoration Feasibility Study.

Federal Projects

- Atchafalaya River and Bayous Chene, Boeuf, and Black, Louisiana Project
- GIWW Project
- FWB
- FWB Lock By-Pass
- Mermentau Basin.

Coastal Wetlands Planning, Protection and Restoration Act (CWPPRA) Projects

- CWPPRA - Freshwater Introduction South of Highway 82
- CWPPRA - South White Lake Shoreline Protection
- CWPPRA – Boston Canal/Vermilion Bay Shore Protection
- CWPPRA – Four Mile Canal Terracing and Sediment Trapping
- CWPPRA – Little Vermilion Bay Sediment Trapping
- CWPPRA – Lake Portage Land Bridge
- CWPPRA – Sediment Trapping at “The Jaws”
- CWPPRA – Bayou Sale Shoreline Protection
- CWPPRA – Cote Blanche Hydrologic Restoration
- CWPPRA – FWB Bank Stabilization
- CWPPRA – FWB Wetland Protection
- CWPPRA – Pecan Island Terracing
- CWPPRA – Oaks/Avery Canal Hydrologic Restoration, Increment 1
- CWPPRA – FWB Canal Shoreline Protection Study.
- CWPPRA – Weeks Bay Shoreline Protection/Freshwater Redirection Project
- CWPPRA-Vermilion River Cutoff Bank Protection Project

- CWPPRA - Marsh Island Hydrologic Restoration Project

State of Louisiana Studies and Projects

- Commercial Canal
- Department of Natural Resources Coastal Management Division, Conditional Coastal Use Permit for maintenance dredging of the Rodere Canal, Commercial Canal and existing open-water canals extending 3,500 feet into Weeks Bay.
- Quintana Canal Cypremort Point Marsh Shore Protection
- Pecan Island Freshwater Introduction
- FWB Bank Protection
- Chenier as Tigre
- Marsh Island
- Hammock Lake
- Yellow Bayou Wetland

FEDERAL INTEREST

Navigation improvements are evaluated based on National Economic Development (NED) benefits according to the Policies and Guidelines (P&G). However, recent Congressionally mandated language expanded the guidelines for calculation of the NED. The Congressionally mandated language states:

> **OFFSHORE OIL AND GAS FABRICATION PORTS SEC. 6009.**
> In determining the economic justification for navigation projects involving offshore oil and gas fabrication ports, the Secretary of the Army, acting through the Chief of Engineers, is directed to measure and include in the National Economic Development calculation the value of future energy exploration and production fabrication contracts and transportation cost savings that would result from larger navigation channels.

For the purposes of this study, the language was interpreted such that any contract awarded to the POI for the fabrication of deepwater offshore exploration and production equipment, the full monetary value of the contract is included in the calculation of NED benefits. It has been further interpreted that this deepwater benefit is to be counted as a benefit for project justification regardless of work being displaced from foreign or domestic yards.

S.2 STUDY OBJECTIVES

PROBLEMS AND OPPORTUNITIES

This study focused on examining opportunities to alleviate the problems stemming from the shallow depth of water access to and from the POI by improving navigation access.

The POI has facilities, infrastructure, and skilled labor in place for fabricating deepwater topsides, but many of the major producers will not consider bids submitted by the POI fabricators due to their inability to transport larger rig components through shallow draft channels. POI specializes in the

topside component, which requires stable vessels for transport to the deep waters of the Gulf of Mexico. Some of the ports along the Gulf of Mexico, including the POI, that were traditionally leaders in shallow water rig component fabrication and rehabilitation have found themselves shut out of the deepwater market due to insufficient draft in existing navigation channels.

Rigs and platforms designed for the shallow offshore environment were light and could use navigation channels with the same width and depth as those used for inland waterborne commerce. New floating rigs that economically extract the hydrocarbons from the deep-sea bottom are much larger and heavier than the traditional shallow rigs. Without project, the port was able to transport primarily inshore structures and some offshore structures in the 5,000 to 6,000 ton range. With project, the businesses will be able to transport offshore structures up to 20,000 tons.

PLANNING OBJECTIVES

In addition, to the Federal objective contained in Engineering Regulation 1105-2-111, the following specific planning objectives were developed for the POI study:

a. Develop the most effective plan for providing deep draft access to the POI from the Gulf of Mexico.
b. Use dredged material to beneficially restore bank line and create marsh.

PLANNING CONSTRAINTS

Planning activities are constrained by laws, policies, and regulations governing Federal water resources development projects. The following environmental and social impacts were considered:

- Avoid and minimize damages to existing healthy marsh or wetlands by disposing of any dredged material in a beneficial manner.

- Federal and state agencies are concerned with deepening and leveeing of channels because scientific literature states that the deepening of channels is often responsible for the demise of wetlands in the Louisiana coastal marshes.

- The POI requested that the channel depth not exceed 20 feet due to increased cost sharing responsibilities for projects beyond 20 feet.

- Vermilion Parish residents have expressed concerns with bank line erosion from wave wash and salinity intrusion.

S.3 ALTERNATIVES

PLAN FORMULATION RATIONALE

The plan formulation rationale is used to evaluate a range of alternatives that would satisfy the planning objectives identified previously. The POI, Louisiana Navigation Reconnaissance Report evaluated a range of alternative alignments from the POI to the Gulf of Mexico and recommended a single economically feasible alignment for further analysis, known as the FWB Alignment. In feasibility, various channel dimensions were investigated to improve navigation from the port and facilitate the construction and transportation of larger, heavier deepwater platforms to the Gulf of Mexico. A preliminary screening was performed and one channel dimension was selected for detailed analysis. The feasibility analysis evaluated several alternatives for dredge disposal

MANAGEMENT MEASURES AND ALTERNATIVE PLANS

Several alternatives existed for routing POI vessel traffic to the Gulf of Mexico (Coastal Engineering and Environmental Consultants, Inc. 2001 and USACE August 2002). All alternatives used the existing channel, known as the Commercial Canal, and connected with the GIWW. The first alternative was to route vessel traffic west on the GIWW and south through the Vermilion River Cutoff to the Gulf of Mexico. The second alternative was to route the vessel traffic southwest through Vermilion Bay and into the Gulf of Mexico. The third alternative was to route vessel traffic east on the GIWW and south through the Lower Atchafalaya River. Cursory investigations that explored the maintenance of navigation channels through Vermilion Bay and the Lower Atchafalaya River revealed that the existence of fluid mud rendered these channels inefficient and, in the case of Vermilion Bay, increased the likelihood of saltwater intrusion. The Lower Atchafalaya River route requires an increased travel distance and would likely incur added transportation delays because of existing structures. Thus, enough information existed to rule out these three alternatives from further study.

FINAL ARRAY OF ALTERNATIVES

The FWB Alignment incorporates four existing channels – Commercial Canal, west on the GIWW and then south on FWB to the Gulf of Mexico – in order to reduce costs. Vessel dimensions are used to design both depth and width of a navigation channel. Several proposed channel dimensions were evaluated based on current traffic patterns and projected vessel sizes based on traffic analysis prepared for the USACE. It was determined that the 150-foot channel would adequately serve the majority of vessel traffic and therefore, was the maximum channel width evaluated.

Channel depths under consideration are 16, 18, and 20 feet below MLLW datum, plus 3 feet of advanced maintenance and overdepth dredging. The shallower depths 16’ and 18’ would not accommodate the larger vessels required to transport deep water topsides and jackets. Additionally, some vessels would be restricted to 1-way traffic in their use of the modified channel.

In response to the marsh loss and erosion in the study area, the USACE and other resource agencies concluded that all dredged material excavated from the inshore channels for the construction and maintenance of this project would be confined behind rock dikes and used to reestablish the bank

line of the eroding channels. Any material not in the confined bank line disposal area, would then be used for wetland restoration in broken marsh areas and shallow open water areas.

COMPARISON OF ALTERNATIVES

An incremental analysis was conducted on alternative channel depths. The selection of the channel depths is based on the size of the deepwater fabrication topsides that POI is projected to win. The 16-foot channel would accommodate topsides of 10,000 tons or less, 18 feet would accommodate 15,000 tons or less and the 20-foot channel would accommodate 20,000 tons or less.

Total construction cost is estimated to be $203 million for the 20-foot channel, $178 million for the 18-foot channel, and $159 million for the 16-foot channel, which would be spent over a 5-year period beginning in year 2007. It should be noted that there are minimal transportation cost savings for channel depths of less than 20 feet because, as mentioned in the Economic Appendix, a user survey identified that 20 feet is the shallowest depth that would accommodate vessels necessary to realize economic benefits.

The tentatively selected plan (TSP) was determined to be 20-feet deep by 150-feet wide and it produces the highest net benefits of $12.9 million with a BCR of 1.8.

KEY ASSUMPTIONS

An analysis of the worldwide petroleum reserves along with estimates of future production by foreign and domestic companies over a 50-year period was developed. According to various studies, shallow water oil exploration is in steady decline and the trend is expected to continue for the near future. Clearly, the focus for future oil exploration and production has shifted to the deeper waters of the Gulf of Mexico and West Africa.

With the TSP and No Action Plan, the U.S. would have a 100 percent market share of Gulf of Mexico topsides and a small percentage of West African topsides and jackets. In the without project conditions, that U.S. share would be divided among the Big Four fabricators that are eligible to bid because of sufficient water depth. In the Gulf of Mexico market, the Big Four are Technip (Gulf Marine Fabricators) in Corpus Christi, TX; Gulf Island Fabricators in Houma, LA; McDermott International in Morgan City, LA; and Kiewit Offshore in Ingleside, TX. The basic assumption for without project conditions is that the POI would not be able to participate as a prime contractor in any of the projected deepwater offshore topsides fabrication projects due to depth restrictions

Over the entire 50-year forecast period, it was projected that 52 production platforms would be developed in the Gulf of Mexico. The POI's share of the U.S. total market under with project conditions was estimated using an average and maximum number of annual production hours. Then several market scenarios were evaluated for deepwater production in addition to the continuing shallow water topside work already assumed. For the with project conditions, the POI is assumed to attract a maximum of 15 topsides, a minimum of 6 topsides, and a median of 13 topsides between 2012 and 2052. The following environmental assumptions were considered:

- Avoid and minimize damage to existing healthy marsh or wetlands by disposing of any dredged material beneficially.

- Deepening and leveeing of channels is often responsible for the demise of wetlands in the Louisiana coastal marshes.

- Residents have expressed concerns with bank line erosion from wave wash and salinity intrusion.

RECOMMENDED PLAN

The plan that reasonably maximizes net contributions to economic development is designated as the NED Plan. The FWB Alignment addresses the primary planning objective of providing improved navigation access for existing and future deepwater oil and gas production platforms at the POI. The least-cost environmentally acceptable method of enlarging the channels to 20-feet deep and 150-feet wide, while disposing of dredge material was developed. The true NED plan might exceed the 20-foot depth, however this study is limited to the 20-foot alternative. The LPP identified for this feasibility report is the 150-foot wide by 20-foot deep alternative. The estimated cost for the initial year, to construct the project, is estimated to be $203,000,000, which includes dredging costs, rock dike construction costs, swing barge installation costs, real estate acquisition costs, and pipeline relocation costs. In addition to these costs, an annual cost is included for the operation of the bypass channel. The annual average cost of OMRR&R is estimated at $3,677,000. The TSP has net benefits of $12.9 million and a Benefit to Cost Ratio of 1.84.

SYSTEMS/WATERSHED CONTEXT

The Louisiana Coastal Area (LCA) team was consulted throughout the study process. The LCA near-term course of action does not have any restoration features in the immediate vicinity of the project. The goals associated with the LCA Ecosystem Restoration Plan (LCA Plan) are to reverse the current trend of degradation of the coastal ecosystem and maximize the use of restoration strategies throughout coastal Louisiana through:

- Ecological restoration of healthy, productive, and diverse coastal habitats within critical, high-priority coastal areas

- Enhanced sustainability of critical, high-priority areas within the LCA that have essential for and function of the natural ecosystem

- Integrated restoration program that results in multiple benefits not solely for wetlands, but for communities, industries, and natural resources of the coast

The only foreseeable impact to the LCA from the POI TSP would be a positive impact resulting from the disposal of dredged material in the shallow water inter-tidal zone on the west side of FWB. This material would be kept in the littoral drift and deposited up and down the coast, thus mimicking the natural building of the Chenier Plains of coastal Louisiana.

ENVIRONMENTAL OPERATING PRINCIPLES

Team members representing various Federal and state resource agencies were invited to actively participate and take ownership in the navigation study early in the process. Invoking the EOPs early in the study process supported NEPA compliance and promoted public acceptance toward the feasibility study. Inviting the resource agencies and stakeholders to be actively involved in the decision making process during the entire plan formulation process was considered “out of the box” thinking by most in the USACE.

Identification of channel alignment and dredged material disposal was accomplished with the help of various agency participants as well as stakeholders to ensure a plan was pursued that would ensure balance and synergy among human development activities and natural systems. The entire dredged material disposal plan was considered precedent setting by the resource agencies and the majority of the public involved in portions of the study process. As a result, the project delivery team (PDT) recognized the interdependence of life and the physical environment and incorporated this relationship into the study process for the best possible outcome. With involvement from individuals outside of the USACE, the environmental consequences related to deepening existing navigation channels allowed a win-win alternative to be identified early in the study process. Existing data was used to exclude unreasonable alternatives, thus minimizing study time and cost.

The TSP meets the majority of the sponsor and stakeholder needs while fully engaging nearly all of the EOPs to culminate in a positive environmental output. The EOPs are consistent with NEPA, the Army's Environmental Strategy with its four pillars of prevention, compliance, restoration and conservation, and other environmental statutes and WRDA that govern USACE activities.

INDEPENDENT TECHNICAL REVIEW

The Mobile District of the USACE performed ITR of the draft main report, DEIS, and all supporting appendices prior to completion of the draft document. The ITR resulted in over 180 comments, all of which have been resolved and closed except for issues related to the design vessel draft requirements.

S.4 EXPECTED PROJECT PERFORMANCE

PROJECT COSTS

A summary of the implementation costs of the TSP is presented in **table S-1**, and a summary of the operation and maintenance costs is presented in **table S-2**. The figures presented have been rounded for reporting convenience.

Table S - 1
Summary of Implementation Costs
(2004 Price Levels)

Construction Cost	$151,943,108
Pre-construction, Engineering & Design	6,198,646
Construction Management	6,941,423
Removals	**21,315,807**
Bulkheads	14,912,344
Real Estate	1,695,000
Fish and Wildlife Mitigation	0
Total Implementation Costs	$203,006,328
(Rounded)	**$203,000,000**

The implementation costs include the costs of the construction of the deepening and widening of the FWB Bypass Channel, FWB Channel, GIWW, Commercial Canal, and the port area; bypass channel floodgates, removals, bulkhead replacement, rock dike construction, erosion protection; the cost of the pre-construction engineering and design of the channel; the costs of managing the construction contract for the channel and associated features; the costs of acquiring additional real estate interests for the sponsor preferred plan; and the costs to avoid and minimize adverse impacts to fish and wildlife caused by construction of the TSP.

Table S - 2
Summary of Operation and Maintenance Costs of the TSP and Avoided Existing O&M Costs (Savings) *(2004 Price Levels)*

Annual O&M Costs	
Annual O&M, 20 X 150-Foot Channel	$ 3,273,000
Annual O&M, Freshwater Bayou Bypass Floodgates	$ 299,000
Annual O&M, Environmental Features and Monitoring	$ 105,000
TOTAL ANNUAL O&M COSTS	**$ 3,677,000**
Annual O&M Savings	
Avoided Annual O&M, 12 X 125-Foot Channel	$ 947,000
Avoided Annual O&M, Freshwater Bayou Bypass Floodgates	$ 120,000
TOTAL ANNUAL O&M SAVINGS	**$ 1,067,000**
Net Total O&M Costs for Tentatively Selected Plan	***$ 2,610,000***

EQUIVALENT ANNUAL COSTS AND BENEFITS

Table S-3 displays how overall project justification is affected by measuring NED benefits in accordance with P&G and in accordance with Congressionally mandated language.

Table S-3
NED Benefits According to P&G
Average Annual Benefits and Costs
(2004, $1,000, 5.375 Percent)

COSTS	
Annual Construction Costs	12,858
Annual O&M Costs	3,677
Total Annual Cost	**16,535**
BENEFITS	
Deepwater Fabrication	0
Transportation Cost Savings	5,223
O&M Benefits	1,067
Total Annual Benefits	6,290
Net Benefits	(10,245)
BCR	0.3
Base Year	2012

Table S-3 (continued)
Appropriations Directed Benefits

	Most Probable – Small GOM Market	Most Probable – Large GOM Market	Low Market Share	Zero Market Share
Costs				
Annual Construction	$12,858	$12,858	$12,858	$12,858
Annual O&M	$3,677	$3,677	$3,677	$3,677
Total Annual Costs	$16,535	$16,535	$16,535	$16,535
Benefits				
O&M Benefits	$1,067	$1,067	$1,067	$1,067
Deepwater Fabrication	$21,091	$33,363	$12,176	$0
Transportation Savings	$5,223	$5,223	$5,223	$5,223
Total Annual Benefits	$27,381	$39,653	$18,466	$6,290
Net Benefits	$10,846	$23,118	$1,931	($10,245)
BCR*	1.8	2.5	1.1	.3

* 2012 base year used in all calculations in Table.

COST SHARING

Estimated Implementation Costs
(2004 Price Levels)

Federal share during construction	$148,450,030
Non-Federal share during construction	
10% of general navigation features	$ 16,494,448
LERR	$ 1,613,000
Local service facilities (bulkheads)	$ 14,912,344
Pipeline removals	$ 21,536,506
Total Non-Fed during construction	$ 54,556,298
Total Project First Costs	$203,006,328

Upon completion of the project, the sponsor would be responsible for a 10 percent payback to the USACE based on total project cost. That amount would be $14,881,448 and can be paid over a period of 30 years. The $1,613,000 for Real Estate is creditable towards the 10 percent after construction.

PROJECT IMPLEMENTATION

The LADOTD would obtain the real estate interest in the Commercial Canal owned by the POI via a cooperative endeavor agreement with the POI. Access to the project site would be available from the GIWW, FWB, and the Gulf of Mexico. For the floodgates, the contractor may mobilize his equipment by barge westward on the GIWW and southward on FWB from New Iberia. The construction site for the by-pass channel structures is located in an isolated location adjacent to the existing FWB Lock. All construction would be performed from barge or water access.

OPERATION, MAINTENANCE, REPAIR, REHABILITATION, AND REPLACEMENT (OMRR&R)

In order to maintain the 20-foot depth in Commercial Canal an estimated 2.6 million cubic yards of material would be dredged for each of the following years 5, 10, 20, 35 and 50 after construction completion. The GIWW would require an estimated 4.2 million cubic yards of material to be dredged in years 10, 25, and 40. The FWB channel would require an estimated 5.7 million cubic yards of material to be dredged in years 10, 25, and 40. The FWB Bar channel would require an estimated 2.3 million cubic yards of material to be dredged every 3 years

KEY SOCIAL AND ENVIRONMENTAL FACTORS

All participating agencies and Vermilion Parish interests expressed concerns that deepening the channels associated with the project would increase salinity levels. The CE-MVN investigated the potential for saltwater intrusion from alternatives under consideration and prepared a written report of its findings (appendix B, section 3). The investigations concluded that, for a channel 20 feet deep from POI through GIWW and FWB, salinity increases would be negligible and should not result in adverse impacts to water supplies, adjacent marshes, or other designated uses.

STAKEHOLDERS PERSPECTIVES AND DIFFERENCES

Coordination with Federal, state, and local agencies and the public was maintained throughout the study to assure that all aspects of the water resource problems were addressed. Public outreach and coordination activities conducted as part of this study include:

- 2 public scoping meetings to gather input to the feasibility study
- Public Meeting to review the draft feasibility report on October 4, 2005

The following statement was provided by the Port of Iberia on 23 August 2005:

> "The Local Sponsor's interest in navigation improvements for the POI and Acadiana Region has been established since the early 1900s. In the early years of the port, access to the Gulf of Mexico was primarily needed for recreational and commercial fisheries but as the oil & gas industry developed and matured, the POI systematically became a "hub" for the central Gulf of Mexico offshore oil & gas fabrication and service industry. For many years the POI, Iberia Parish, Acadiana Business Community, and the State of Louisiana have invested millions of dollars of infrastructure in support of the jobs and economic well-being of the

POI. Currently, the POI requires significant waterway and channel improvements for it to continue to support and service the oil & gas industry as it moves further out into the Gulf of Mexico.

“To accomplish this initiative Congress, in the Water Resources Development Act of 2000, authorized the USACE "to conduct a study to determine the feasibility of carrying out a project for navigation, Port of Iberia, Louisiana" and this report is a corroboration of that effort. As this Feasibility Study was being accomplished, it became apparent to everyone involved that the Principals and Guidelines (P&G) that the USACE typically uses for "Commodity Handling/Shipping Ports" did not capture the true National Economic Development (NED) Benefits for an "Offshore Oil and Gas Fabrication Port" and therefore Congress enacted revised legislation and "new" language that redefined NED Benefits for Offshore Oil and Gas Fabrication Ports. That language, stated in Section 6009 of Public Law 109-13, allows the inequities of the original P&G to be corrected and truly depicts the NED Benefits of this project.

“In addition, the Economic appendix of this report, the USACE bases its economic projections for fabrication contracts for "deepwater" topsides on an assumption that no major world markets can be expected to offer substantial new opportunities for POI fabricators. The POI has disputed this assumption all along and has sited many instances where this assumption is incorrect. Proof toward the POI's position is verified by the fact that recently Dynamic Industries, Inc., a POI fabricator, was awarded a $150 million dollar contract from Cabrinda Gulf Oil and Gas Company for two offshore platforms and pipelines for the Banzala Lago Development in Angola (The Daily Advertiser dated 08/12/05). Therefore, it is the POI's opinion that the 1.8 to 1 Benefit Cost Ratio (BCR) that is being used throughout this report to justify the project is extremely conservative and does not include the entire international market sector.

“Due to the time constraints of this project and the minimum requirement of WRDA to only have a BCR greater than one, the POI has agreed to allow this "draft" report to go unchanged, but would like the reviewer of this document to be aware that it is the opinion of the Local Sponsor that the BCR included in this report is very conservative and should be higher.”